

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

**BRIDGESTONE AMERICAS, INC.)
MASTER PENSION TRUST;)
THE EMPLOYEE TRUST INVESTMENT)
COMMITTEE; and BRIDGESTONE)
AMERICAS, INC.,)**

Plaintiffs,

v.

**WESTFORD SPECIAL SITUATIONS FUND)
LTD.; WESTFORD SPECIAL SITUATIONS)
FUND II LTD.; WESTFORD SPECIAL)
SITUATIONS MASTER FUND LP;)
WESTFORD ASSET MANAGEMENT LLC;)
SGS ASSET MANAGEMENT LTD.;)
WESTFORD GLOBAL ASSET)
MANAGEMENT LTD.; and STEVEN G.)
STEVANOVICH,)**

Defendants.

Case No. 3:13-cv-00748

**Judge Aleta A. Trauger
Magistrate Judge E. Clifton Knowles**

JURY DEMAND

FIRST AMENDED CASE MANAGEMENT ORDER

The parties jointly submit the following amendments the Initial Case Management Order entered on October 16, 2013 [DE #15]. As contemplated by Section F of the Initial Case Management Order, the parties have been exchanging and continue to exchange documents and information and are continuing to work together in an effort to find a consensual solution. Amending the following deadlines will allow that process to continue. Unless specifically amended below, all provisions of the Initial Case Management Order remain in effect.

A. RESPONSIVE PLEADING: Defendants shall file responsive pleadings on or before February 17, 2014, or at such other time upon agreement of the parties or subsequent order of the Court.

B. INITIAL DISCLOSURES: The parties intend to exchange initial disclosures pursuant to FED. R. CIV. P. 26(a)(1) no later than February 3, 2014. Any party, however, may make written demand upon any other party that initial disclosures be exchanged within fourteen (14) days of such demand, and the parties shall do so.

C. FORMAL DISCOVERY: The Parties shall complete all written discovery and depose all fact witnesses on or before November 28, 2014. Discovery is not stayed pending dispositive motions, unless ordered by the Court. Local Rule 33.01(b) is expanded to allow 40 interrogatories, including subparts. No motions concerning discovery are to be filed until after the parties have conferred in good faith and, unable to resolve their differences, have scheduled and participated in a conference call with Judge Trauger, or, if directed, a Magistrate Judge.

D. MOTIONS TO AMEND: The parties shall file all motions to amend on or before March 31, 2014.

E. DISCLOSURE OF EXPERTS: Plaintiffs shall identify and disclose all expert witnesses and expert reports on or before January 16, 2015. Defendants shall identify and disclose all expert witnesses and expert reports on or before February 20, 2015.

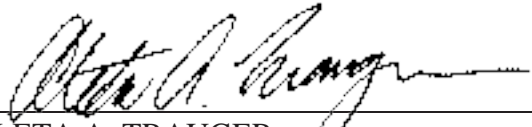
F. DEPOSITIONS OF EXPERT WITNESSES: The parties shall depose all expert witnesses on or before March 30, 2015.

G. DISPOSITIVE MOTIONS: The parties shall file all dispositive motions on or before April 20, 2015. Responses to dispositive motions shall be filed within twenty-eight (28) days after the filing of the motion. Optional replies may be filed within fourteen (14) days after

the filing of the response. Briefs shall not exceed 20 pages without permission of the Court. No motion for **partial** summary judgment shall be filed except upon leave of Court. Any party wishing to file such a motion shall first file a separate motion that gives the justification for filing a partial summary judgment motion in terms of overall economy of time and expense for the parties, counsel and the Court.

H. ELECTRONIC DISCOVERY: The parties desire not to use Administrative Order No. 174 to control electronic discovery in this matter. The parties are currently negotiating electronic discovery protocols and anticipate an agreement. Should the parties not reach an agreement as to the protocols on or before March 14, 2014, then Administrative Order No. 174 will control electronic discovery in this matter.

It is so **ORDERED**.



ALET A. TRAUGER
United States District Judge

APPROVED FOR ENTRY:

/s/ Michael Harmon w/p JLF

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